

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 4/30/2013, 5/2/2013	Man Days: 0
Inspection Unit: [ALL UNITS]	
Location of Audit: ICC Headquarters	
Exit Meeting Contact:	
Inspection Type: Standard Inspection Plan Review- O and M	
Pipeline Safety Representative(s): Jim Watts	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.

REPORTING PROCEDURES		Status
<b><u>Category Comment:</u></b> <i>No revisions were issued regarding the following requirements.</i>		
[192.605(b) (4)][191.5]	Does the operator's procedure require Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Checked
[192.605(b) (4)][191.9(a)]	Does the operator's procedure require a DOT Incident Report Form 7100.1 submitted within 30 days after detection of an incident?	Not Checked
[192.605(b) (4)][191.9(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100.1)	Not Checked
[192.605(b) (4)][191.15(a)]	Does the operator's procedure require a DOT Incident Report Form 7100-2 submitted within 30 days after detection of an incident?	Not Checked

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[192.605(b) (4)][191.15(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100-2)	Not Checked
[192.605(a)][191.25]	Does the operator's procedure require filing the SRCR within 5 days of determination, but not later than 10 days after discovery?	Not Checked
[192.605(d)][191.23]	Does the operator's procedure contain instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions?	Not Checked
[595.120.(a)]	Reports of Accidents: Does the operator have provisions for reporting accidents or damage to the ICC? (217-782-5050)	Not Checked
<b>CUSTOMER NOTIFICATION AND EFV INSTALLATION PROCEDURES</b>		<b>Status</b>
<b><u>Category Comment:</u></b> Customer Notification and EFV installation were not reviewed due to these items not being included in the O&M revisions for Version 5.1.		
[192.13(c)][192.16]	Does the operator have procedures for notifying new customers, within 90 days, of their responsibility for those sections of service not maintained by the operator?	Not Checked
[192.13(c)][192.381]	Does the operator's procedure require that when EFVs are installed on single family residents that shall at a minimum meet the performance requirements of §192.381?	Not Checked
<b>INSTALLATION OF TRANSMISSION &amp; DISTRIBUTION MAIN PIPE</b>		<b>Status</b>
[192.13(c)][192.319]	Does the operator's procedure contain specifications for installation of transmission line or main in a ditch?	Not Checked
<b><u>General Comment:</u></b> No changes were made to the procedures regarding the installation of main or transmission lines in a ditch. The use of specific fusion fittings were revised and will be included in the fusion section of this checklist.		
[192.13(c)][192.321]	Does the operator's procedure contain specifications for installation of plastic pipe in the ditch including a means of locating pipe?	Not Checked
<b><u>General Comment:</u></b> No revisions or additions were made to the current procedures regarding the required use of locating wire to allow for locating.		
[192.13(c)][192.323]	Does the operator's procedure contain casing requirements?	Satisfactory
<b><u>General Comment:</u></b> Review of CORR 3.17 Cased Crossing Monitoring specifies the requirements for a new casing installation and the installation of test leads to allow for establishing electrical isolation through monitoring. No issues were identified with the addition of this section.		
[192.13(c)][192.325]	Does the operator's procedure contain underground clearance specifications?	Not Checked

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<b><u>General Comment:</u></b>		
No revisions were submitted regarding underground clearance in the sections of the O&M that were revised.		
[192.13(c)][192.327]	Does the operator's procedure specify the amount of cover required for various types of installations?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b>		
Review of MAIN 1, indicates that when main is installed with less than the required amount of cover, a warning barrier tape is utilized as a warning method to future excavators. Staff does not agree that this sole measure is sufficient to protect the piping. Warning barrier tape cannot withstand external loading and is not an effective stand alone damage prevention measure. Shallow installation locations should also be noted on company mapping utilized by locating and company personnel. Such a precaution will allow the locator to warn excavators of the shallow condition. Depending of the location of the shallow pipe additional measures may be required to prevent undue strains being exerted on the pipe. The procedure shall include a process to initiate an engineering review to ensure the pipe is adequately protected against strains and subsequent damage. This section needs further revisions or if protection of shallow facilities is covered elsewhere in the O&M, a reference needs to be added here.		
<b>SERVICE LINE INSTALLATION</b>		<b>Status</b>
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as depth?	<b>Not Checked</b>
<b><u>General Comment:</u></b>		
No revisions to service line depth were included in the procedure changes submitted.		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as support and backfill	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
The revision of SERV 1 includes adequate requirements for backfill of service lines and includes the requirement for adequate support and being free of materials that could damage pe piping or coating.		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as protection against strain and loading	<b>Not Checked</b>
<b><u>General Comment:</u></b>		
No revisions to support or strains were included in the revised procedures submitted for review.		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line into a building	<b>Not Checked</b>
<b><u>General Comment:</u></b>		
No revisions regarding installation of a service line under a building were included in this packet of revisions.		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line under a building	<b>Not Checked</b>
<b><u>General Comment:</u></b>		
No revisions were submitted regarding their procedures for service lines installed under buildings.		
[192.13(c)][192.365]	Does the operator's procedure address service line valve location?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		

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*The revised procedure SERV 3.06 for single cut farm tap installations include the requirement for the installation of a valve on the above ground piping at the farm tap and can include as an option a below ground valve near the tap. Both the high and lower pressure zones have EFV's installed.*

[192.13(c)][192.367]	Does the operator's procedure include specifications for service line connection to the main?	<b>Satisfactory</b>
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**General Comment:**

*Review of the revised procedures submitted for service line installations did include specifications for the connection to the main. These were 3.05, 3.06, 3.07 and 3.08.*

CUSTOMER METERS AND REGULATORS	Status
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[192.13(c)][192.353]	Does the operator's procedure contain requirements for the location of meters and regulators?	<b>Unsatisfactory</b>
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**NOA Comment:**

*Review of revisions submitted for METER sections 3.21-3.26 do not include the provision for installing protector posts in the material lists if the meter set is prone to vehicular traffic or other types of damage. There is a requirement in METER 1 in 3 F (3) that requires the installation of guard posts or railings to protect from damage where exposed to vehicular traffic or other outside forces. Staff requests that the materials allowed to be used for protection shall be defined or referenced in each of the applicable metering sections. If these are a case by case design, then add a statement requiring the installer to contact engineering to design the required barrier to provide ample protection to protect the meter set against damage.*

[192.13(c)][192.355]	Does the operator's procedure contain provisions to protect customer's meters and regulators from damage?	<b>Not Checked</b>
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**General Comment:**

*These requirements were not included in the revisions submitted.*

[192.13(c)][192.357(a)]	Does the operator's procedure require each regulator and meter to be installed so as to minimize anticipated stresses upon the connecting piping and the meter?	<b>Satisfactory</b>
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**General Comment:**

*A majority of the revisions made in the metering sections submitted were regarding the use of specific sized uni-strut brackets for piping support. The sections revised for additional longitudinal support were 3.21-3.26.*

[192.13(c)][192.357(d)]	Does the operator's procedure require each regulator that might release gas in its operation to be vented to the outside atmosphere?	<b>Not Checked</b>
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**General Comment:**

*No revisions were submitted regarding the installation or location of the relief or regulator that may vent gas to atmosphere.*

NORMAL OPERATING AND MAINTENANCE PROCEDURES	Status
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[192.605(a)]	Does the operator's procedure require the O&M Plan to be reviewed and updated at a minimum of 1 per year/15 months?	<b>Not Checked</b>
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**General Comment:**

*This section was not included in the revisions submitted by the operator for review.*

Does the operator's procedure require the OQ Plan to be reviewed and updated in connection with the O&M Plan review at a minimum of 1 per year/15 months?	<b>Not Checked</b>
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<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
Do procedures clearly include the name of the reviewer and dates of reviews?	<b>Not Checked</b>	
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.605(b)(3)]	Does the operator's procedure require making construction records, maps, and operating history available to appropriate operating personnel?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.605(b)(5)]	Does the operator's procedure contain provisions for start up and shut down of a pipeline to assure operation within MAOP plus allowable buildup?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.605(b)(8)]	Does the operator's procedure contain provisions for periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.605(b)(9)]	Does the operator's procedure contain provisions taking for adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line? If not, then does the plan include prohibiting personnel from entering excavated trenches that may be hazardous?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
<b>ABNORMAL OPERATING PROCEDURES FOR TRANSMISSION</b>		<b>Status</b>
[192.605(a)][192.605(c)(1)(i)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of unintended closure of valves or shut downs?	<b>Not Checked</b>
<b><u>General Comment:</u></b>		

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<i>This was not included in the revisions submitted for review.</i>		
[192.605(a)][192.605(c)(1)(ii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside of normal operating limits?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of EMER 2.04 indicates sufficient procedures are in place to identify, monitor and take the necessary actions to correct an indication of abnormally high or low pressures. EMER 2.02 revisions to the Dispatch Center requirements were regarding actions to be taken when restoring electrical service after an outage when temperatures are below 30 degrees. No issues were identified during the review of the revisions submitted.</i>		
[192.605(a)][192.605(c)(1)(iii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of loss of communications?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
[192.605(a)][192.605(c)(1)(iv)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of the operation of any safety device?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
[192.605(a)][192.605(c)(1)(v)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operations or personnel error?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
[192.605(a)][192.605(c)(2)]	Does the operator's procedure contain provisions for checking variations from normal operation after abnormal operations ended at sufficient critical locations?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
[192.605(a)][192.605(c)(3)]	Does the operator's procedure contain provisions for notifying the responsible operating personnel when notice of an abnormal operation is received?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed EMER 2.02 Dispatch Center, 2.04 Gas Field Personnel responsibilities and 2.05 Natural Disasters and Civil Disobedience. The revision all pertained to establishing and maintaining communications during an emergency. No issues were identified in the revisions submitted.</i>		
[192.605(a)][192.605(c)(4)]	Does the operator's procedure contain provisions for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found?	<b>Not Checked</b>

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CHANGE IN CLASS LOCATION PROCEDURES		Status
[192.605(a)][192.609]	Does the operator's procedure contain provisions for conducting a class location survey whenever an increase in populations density indicates a change in class location or a segment of an existing steel pipeline operating at a hoop stress that is more than 40 percent of SMYS, or indicates that the hoop stress corresponding to the established MAOP for a segment of existing pipeline is not commensurate with the present class location?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.611]	In the event a change in class location becomes necessary does the manual contain procedures for confirmation or revision of the MAOP?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
CONTINUING SURVEILLANCE PROCEDURES		Status
[192.613(a)]	Does the operator's procedure include requirements for continuing surveillance of facilities to determine and take appropriate action concerning class location changes, failures, leak history, corrosion, cathodic protection requirements, and other unusual operating conditions?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator.</i>		
[192.613(a)][192.613(b)]	Does the operator's procedure include requirements for reducing the MAOP, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.613(a)][192.459]	Does operator have procedures for determining if exposed cast iron was examined for evidence of graphitization and, if necessary, were remedial actions taken?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Ameren has no cast iron in their Illinois Service Territory.</i>		
[192.613(a)][192.489]	Does the operator's procedure include requirements	<b>Not Applicable</b>

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	for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating maintenance conditions?	
<b>General Comment:</b> <i>Ameren has no cast iron in their Illinois Service Territory.</i>		
<b>DAMAGE PREVENTION PROGRAM PROCEDURES</b>		<b>Status</b>
[192.605(a)][192.614(c)(1)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- identifies persons who engage in excavating?	<b>Not Checked</b>
<b>General Comment:</b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.614(c)(2)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification to the public in the One Call area?	<b>Not Checked</b>
<b>General Comment:</b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.614(c)(3)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means for receiving and recording notifications of pending excavations?	<b>Not Checked</b>
<b>General Comment:</b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.614(c)(4)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification of pending excavations to the members?	<b>Not Checked</b>
<b>General Comment:</b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.614(c)(5)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means of temporary marking for the pipeline in the vicinity of the excavations?	<b>Satisfactory</b>
<b>General Comment:</b>		



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The operator has added references to the procedures for the line locators currently being used by their field personnel. These were added to LOCT 4.		
[192.605(a)][192.614(c)(6)(i)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- Inspection must be done to verify integrity of the pipeline?	Not Checked
<b>General Comment:</b> This section was not included in the revisions submitted by the operator for review.		
[192.605(a)][192.614(c)(6)(ii)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- After blasting, a leak survey must be conducted as part of the inspection by the operator?	Not Checked
<b>General Comment:</b> This section was not included in the revisions submitted by the operator for review.		
Has the Operator adopted the applicable Common Ground Alliance Best Practices?		Yes
<b>General Comment:</b> This section was not included in the revisions submitted by the operator for review.		
Does the operator have adequate directional drilling/boring procedures to determine effective actions to protect their underground facilities from the dangers posed by directional drilling and other trenchless technology? A pipeline operator's damage prevention program shall include actions to protect their facilities when directional drilling operations are conducted in proximity to the pipeline. These procedures should include, but are not limited to, accurately locating underground piping and reviewing personnel qualifications?		No
<b>General Comment:</b> Review of the revision to BORE 2.05 Typical sewer installation for a home on a crawl space - very elevated lot - #12. Staff established there is no period after exposed in #3 of this section. Should there be more wording or should there be a "period" after exposed?  12. Home with Crawl Space – Very Elevated Lot  1. A visual inspection would show that the home is built on a crawl space.  2. Even though this is an elevated lot, the sewer depth would be approximately the same as a typical gas main installation. 3. This is considered a "High Risk Sewer Lateral" if the sewer lateral can't be located and exposed		
<b>NOA Comment:</b> Staff identified that during the review process the operator failed to place a period at the end of the sentence in # 3 of BORE 2.05. Staff requests the operator to make the necessary revisions to this section.		
[IL ADM. CO.265.100(b)]	Does the operator have procedures to report third party damage to mains, when a release of gas occurs, reported to ICC JULIE Enforcement?	Not Checked
<b>General Comment:</b> This section was not included in the revisions submitted by the operator for review.		

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EMERGENCY PROCEDURES		Status
[192.615(a)(9)]	Does the operator have procedures for restoring service outages after the emergency has been rendered safe?	Not Checked
<b>General Comment:</b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.615(a)(1)]	Does the operator have procedures for receiving, identifying, and classifying notices of events which require immediate response by the operator?	Unsatisfactory
<b>NOA Comment:</b> <i>Review of Gas Leak Field Case reports revision log submitted determined the indicated revision to 2. A. (12) which was the addition of Job Order # does not appear to have been added. DOJM Order is still indicated rather than Job Order #. Staff requests Ameren to review and see what is correct.</i>		
[192.615(a)(2)]	Does the operator have procedures for establishing and maintaining communication with appropriate public officials regarding possible emergency?	Satisfactory
<b>General Comment:</b> <i>Review of EMER 2.04 and EMER 2.05 determined there are requirements for maintaining communication with emergency officials. No issues with the revisions submitted in these two sections.</i>		
[192.615(a)(3)(i)]	Does the operator have procedures for prompt response to gas detected inside or near a building?	Unsatisfactory
<b>NOA Comment:</b> <i>In 2 D. (5) of LEAK 2.05 Ameren allows the use of an FI or CGI with bar holes to be utilized in the verification method during a recheck to verify if below ground gas exists. In D of the Leak Recheck in the Gas Leak Case Field report, the form only allows a CGI to be used for verification of a below ground leak. Can an FI be used to determine if a below ground leak exists when performing a leak recheck or can only a CGI be utilized because there is no place to record the use of an FI.</i>		
[192.615(a)(3)(ii)]	Does the operator have procedures for prompt response to a fire located near a pipeline?	Not Checked
<b>General Comment:</b> <i>This was not included in the revisions submitted for review.</i>		
[192.615(a)(3)(iii)]	Does the operator have procedures for prompt response to an explosion near a pipeline?	Unsatisfactory
<b>NOA Comment:</b> <i>Review of the revisions to INVE 2.20 detected an issue with a hot link in the current version of the O&amp;M 5.1. The link indicates to review INCD 1 but when you click on it you are taken to INVE 1. Staff requests that the hot link be reviewed and corrected.</i>		
[192.615(a)(3)(iv)]	Does the operator have procedures for prompt response to natural disasters?	Satisfactory
<b>General Comment:</b> <i>Staff's review of the revisions to EMER 2.05 response to Natural Disasters or Civil Disobedience determined the operator has adequate procedures to response to the above emergencies. The changes to the O&amp;M were only wording revisions and changes in job title names.</i>		
[192.615(a)(4)]	Does the operator have procedures for the availability of personnel, equipment, instruments, tools, and material required at the scene of an	Satisfactory

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	emergency?	
<p><b><u>General Comment:</u></b></p> <p><i>This section was revised in EMER 2.06 and included the removal of the requirement in 4. A. (1) for "all operating areas to have a minimum of 20 feet of each size of plastic pipe used in that area.</i></p> <p><i>Revised the requirement in 4. A. (7) for storing pe pipe. The revision states the shelf life of pe is 2 years from the date of manufacture. Pipe that is stored for emergencies should be rotated to make sure that no plastic pipe goes past the shelf life.</i></p>		
[192.615(a)(5)]	Does the operator have procedures for actions directed towards protecting people first, then property?	<b>Satisfactory</b>
<p><b><u>General Comment:</u></b></p> <p><i>Review of EMER 2.04 indicates the operator states in their procedures to protect life first then property as the main focus during an emergency.</i></p>		
[192.615(a)(6)]	Does the operator have procedures for emergency shutdown or pressure reduction to minimize hazards to life or property?	<b>Not Checked</b>
<p><b><u>General Comment:</u></b></p> <p><i>The procedures in 2 of EMER 2.04 require the gas supply to be shut off if a hazardous accumulation of gas is detected within a structure. For leaks on mains that may be migrating or creating a hazard to life or property their procedures in 1 of EMER 2.04 require using emergency valves or squeeze off's to isolate the leak.</i></p>		
[192.615(a)(7)]	Does the operator have procedures to require making safe any actual or potential hazard to life or property?	<b>Satisfactory</b>
<p><b><u>General Comment:</u></b></p> <p><i>The procedures in EMER 2.04 define the steps to take to attempt to make safe any hazard to life or property.</i></p>		
[192.615(a)(8)]	Does the operator have procedures requiring the notification of appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials?	<b>Satisfactory</b>
<p><b><u>General Comment:</u></b></p> <p><i>The use of outside agencies such as fire or police is defined in 4. B of EMER 2.04. This procedure requires the responding personnel to contact their supervisor.</i></p>		
[192.615(a)(10)]	Does the operator have procedures for investigating accidents and failures as soon as possible after the emergency?	<b>Satisfactory</b>
<p><b><u>General Comment:</u></b></p> <p><i>This section was revised to change the responsibility of investigating failures and incidents from Gas Compliance Group to Gas Standards and Procedures Group.</i></p>		
[192.615(b)(1)]	Does the operator have procedures for furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action?	<b>Unsatisfactory</b>
<p><b><u>NOA Comment:</u></b></p> <p><i>Staff's reviews of the forms referenced in INVE 4 utilized to document incident findings and maintain chain of custody, do not have form numbers or date of</i></p>		

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current edition. Staff suggests assigning form numbers to allow employees to ensure they are using the correct form and give it a date to ensure the current edition is being used.

[192.615(b)(2)]	Does the operator have procedures for training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training?	Not Checked
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**General Comment:**

This section was not included in the revisions submitted by the operator for review.

[192.615(b)(3)]	Does the operator have procedures for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?	Not Checked
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**General Comment:**

This section was not included in the revisions submitted by the operator for review.

[192.615(c)]	Does the operator have procedures to establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies?	Not Checked
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**General Comment:**

This section was not included in the revisions submitted by the operator for review.

Does the operator have procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings?	Yes
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**General Comment:**

The procedures for leakage due to excavation damage are defined in EMER 2.04 4. A.

FAILURE INVESTIGATION PROCEDURES		Status
[192.617]	Does the operator have procedures for analyzing accidents and failures, including laboratory analysis where appropriate, to determine cause and prevention of recurrence?	Satisfactory

**General Comment:**

Review of EMER 2.08 Investigation of Failures determined the intent of the requirement is being met and the revisions enhanced the procedure and the reporting process.

MAOP PROCEDURES		Status
[192.605(a)][192.621]	Does the operator have procedures for establishing the MAOP for High Pressure Distribution Systems?	Not Checked

**General Comment:**

This section was not included in the revisions submitted by the operator for review.

[192.605(a)][192.623]	Does the operator have procedures for establishing	Not Checked
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# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	the Minimum and Maximum Allowable Operating Pressure Low Pressure Distribution Systems?	
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.619(a)(1)]	Is MAOP determined by design and test? or	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.619(a)(2)]	Does the operator have procedures requiring the MAOP to be determined by test pressure divided by applicable factor?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.619(a)(3)]	Does the operator have procedures requiring the MAOP to be determined by highest operating pressure to which the segment of line was subjected between July 1, 1965 and July 1, 1970?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.619(a)(4)]	Does the operator have procedures requiring the MAOP to be determined by the maximum safe pressure determined by operator?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.619(b)]	Does the operator have procedures requiring overpressure devices be installed if .619 (a) (4) is applicable?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
<b>PRESSURE TEST PROCEDURES</b>		<b>Status</b>
[192.13(c)]	Does the plan allow for the use of pre-tested pipe for repairs?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.13(c)][192.503(a)(1)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until it is pressure tested in accordance with this subpart and §192.619 to substantiate the	<b>Satisfactory</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	maximum allowable operating pressure; and	
<b><u>General Comment:</u></b> <i>PTST 1 requires piping to be pressure tested prior to gas service being restored and the revision does not permit testing against a closed tap tee or a closed system isolation valve (does not include a riser valve on a service).</i>		
[192.13(c)][192.503(a)(2)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until all potentially hazardous leaks have been located and eliminated?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.13(c)][192.503(b)(1),192.503(b)(2),192.503(b)(3)]	Does the operator's procedure indicate that, for a new segment of pipeline, or a segment of pipeline that has been relocated or replaced, the pressure test medium must be liquid, air, natural gas, or inert gas that is compatible with the material of which the pipeline is constructed, relatively free of sedimentary materials, and except for natural gas, nonflammable?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.13(c)][192.503(d)]	Does the operator's procedure indicate that each joint used to tie in a test segment of pipeline is excepted from the specific test requirements of this subpart, but each non-welded joint must be leak tested at not less than its operating pressure?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>PTST 1 requires piping to be pressure tested prior to gas service being restored and the revision does not permit testing against a closed tap tee or a closed system isolation valve (does not include a riser valve on a service).</i>		
[192.13(c)][192.505(b)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more which are based on class location?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.13(c)][192.505(c)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more to be tested at or above the required test pressure for at least 8 hour?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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[192.13(c)][192.505(d)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYSs or more for replacement components if not certified by manufacturer?	<b>Not Checked</b>
<p><b><u>General Comment:</u></b></p> <p><i>This section was not included in the revisions submitted by the operator for review.</i></p>		
[192.13(c)][192.505(e)]	Except for service lines, Does the operator's procedure include requirements for fabricated units and short sections of pipe which operates at a hoop stress of 30% or more of SMYS and for which a post installation test is impractical, that a pre-installation strength test must be conducted by maintaining the pressure for at least 4 hours?	<b>Not Checked</b>
<p><b><u>General Comment:</u></b></p> <p><i>This section was not included in the revisions submitted by the operator for review.</i></p>		
[192.13(c)][192.507]	Does the operator's procedure include requirements for testing pipelines, which operate at a hoop stress less than 30% of SMYS and at or above 100 psig?	<b>Not Checked</b>
<p><b><u>General Comment:</u></b></p> <p><i>This section was not included in the revisions submitted by the operator for review.</i></p>		
[192.13(c)][192.509(b)]	Does the operator's procedure include requirements for testing steel main which operate below 100 psig at a minimum of 10 psig for main that operates below 1 psig and for each steel main to operate below 100 psig test to a minimum of 90 psig for main that operates over 1 psig?	<b>Not Checked</b>
<p><b><u>General Comment:</u></b></p> <p><i>This section was not included in the revisions submitted by the operator for review.</i></p>		
[192.13(c)][192.511(b)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure as follows: 50 psig if the line operates over 40 psig?	<b>Not Checked</b>
<p><b><u>General Comment:</u></b></p> <p><i>This section was not included in the revisions submitted by the operator for review.</i></p>		
[192.13(c)][192.511(c)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure of 90 psig if the line operates over 40 psig, unless the service line is stressed to 20% or more SMYS then testing must be conducted in accordance with 192.507?	<b>Not Checked</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.13(c)][192.513(c)]	Does the operator's procedure include test requirements for plastic pipelines of 150% of MOP or 50 psig whichever is greater?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.13(c)][192.517(a)(1)]	Does the plan require test records for pipelines that operate over 100 psig that include: Operators name, responsible employee's name, name of testing company?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Section PTST 0 was revised and added PTST 4 which includes the required information to document a pressure test. Ameren has developed a pressure test stamp to be used to record the pressure test if not recorded on as built print. PTST 2.01 and 2.02 were revised indicating the allowed gauges to be used to observe a pressure test that does not require an 8 hour duration test.</i>		
[192.13(c)][192.517(a)(2)]	Does the plan require test records for pipelines that operate over 100 psig that include test medium?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>This information is required to be documented when using the test stamp or recorded on the as built print test data. This is defined in the procedures located in PTST 1.</i>		
[192.13(c)][192.517(a)(3)]	Does the plan require test records for pipelines that operate over 100 psig that include test pressure?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>This information is required to be documented when using the test stamp or recorded on the as built print test data. This is defined in the procedures located in PTST 1.</i>		
[192.13(c)][192.517(a)(4)]	Does the plan require test records for pipelines that operate over 100 psig that include test duration?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>This information is required to be documented when using the test stamp or recorded on the as built print test data. This is defined in the procedures located in PTST 1.</i>		
[192.13(c)][192.517(a)(5)]	Does the plan require test records for pipelines that operate over 100 psig that include pressure recording charts of readings?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>In PTST 1 3. Depending on the pressure test duration either charts or gauges can be utilized to document the pressure test. Tests over 8 hours in length must be charted.</i>		
[192.13(c)][192.517(a)(7)]	Does the plan require test records for pipelines that operate over 100 psig that include leaks and failures noted?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>PTST 1. 9. Requires the disposition of all leaks identified during the pressure test to be documented.</i>		



# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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ODORIZATION of GAS PROCEDURES		Status
<b><u>Category Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.625(a)]	Does the operator's procedure include a requirement that distribution lines must contain odorized gas?	Not Checked
[192.605(a)][192.625(b)]	Does the operator's procedure require odorized gas in Class 3 or 4 locations (if applicable)?	Not Checked
[192.605(a)][192.625(f)]	Does the operator's procedure require periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable?	Not Checked
TAPPING PIPELINES UNDER PRESSURE PROCEDURES		Status
<b><u>Category Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.627]	Does the operator's procedure require that hot taps be made by a qualified crew?	Not Checked
PIPELINE PURGING PROCEDURES		Status
<b><u>Category Comment:</u></b> <i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(a)][192.629(a)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing air must be properly purged?	Not Checked
[192.605(a)][192.629(b)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing gas must be properly purged?	Not Checked
MAINTENANCE PROCEDURES		Status
[192.605(a)][192.703(b)]	Does the operator's procedure require that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service?	Satisfactory
<b><u>General Comment:</u></b> <i>LEAK 2.04 requires the replacement or repair of any leaking facility that is hazardous to life or property.</i>		
[192.605(a)][192.703(c)]	Does the operator's procedure require that hazardous leaks must be repaired promptly?	Satisfactory
<b><u>General Comment:</u></b> <i>LEAK 2.04 requires the replacement or repair of any leaking facility that is hazardous to life or property.</i>		
TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES		Status

## OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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<b><u>Category Comment:</u></b>		
<i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(b)][192.705(a)]	Does the operator's procedure require patrolling of surface conditions on and adjacent to transmission line right of way for indications of leak, construction activities, and other factors affecting safety and operations?	<b>Not Checked</b>
[192.605(b)][192.705(b)]	Does the operator's procedure require that the frequency of patrols is to be determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in .705(b)?	<b>Not Checked</b>
[192.605(b)][192.706]	Does the operator's procedure require leakage surveys at a minimum of 1 year/15 months	<b>Not Checked</b>
[192.605(b)][192.706(a)]	Does the operator's procedure include leak detector equipment survey requirements for transmission lines transporting un-odorized gas in Class 3 locations 7½ months but at least twice each calendar year?	<b>Not Checked</b>
[192.605(b)][192.706(b)]	Does the operator's procedure include leak detector equipment survey requirements for lines transporting un-odorized gas in Class 4 locations - 4½ months but at least 4 times each calendar year?	<b>Not Checked</b>
<b>DISTRIBUTION SYSTEM PATROLLING &amp; LEAKAGE SURVEY PROCEDURES</b>		<b>Status</b>
<b><u>Category Comment:</u></b>		
<i>This section was not included in the revisions submitted by the operator for review.</i>		
[192.605(b)][192.721(a)]	Does the operator's procedure require the frequency of patrolling mains to be determined by the severity of the conditions which could cause failure or leakage?	<b>Not Checked</b>
[192.605(b)][192.721(b)(1)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled in business districts at intervals not exceeding 4½ months, but at least four times each calendar year? and	<b>Not Checked</b>
[192.605(b)][192.721(b)(2)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year?	<b>Not Checked</b>
[192.605(b)][192.723(b)(1)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations	<b>Not Checked</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	and conditions, and be performed with leak detector equipment in business districts as specified, 1/yr (15 months)?	
[192.605(b)][192.723(b)(2)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	<b>Not Checked</b>
<b>LINE MARKER PROCEDURES</b>		<b>Status</b>
<u><b>Category Comment:</b></u> No revisions to this section or requirement.		
[192.605(b)][192.707]	Does the operator's procedure require that line markers be installed and labeled as required?	<b>Not Checked</b>
<b>TRANSMISSION RECORD KEEPING PROCEDURES</b>		<b>Status</b>
<u><b>Category Comment:</b></u> No revisions to this section or requirement.		
[192.605(b)][192.709(a)]	Does the operator's procedure require that records must be maintained on repairs to the pipe for the life of the system?	<b>Not Checked</b>
[192.605(b)][192.709(b)]	Does the operator's procedure require that records must be maintained on repairs to "other than pipe" for 5 years?	<b>Not Checked</b>
[192.605(b)][192.709(c)]	Does the operator's procedure require that records must be maintained for Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests for 5 years or until next completion of the next inspection cycle?	<b>Not Checked</b>
<b>TRANSMISSION FIELD REPAIR PROCEDURES</b>		<b>Status</b>
<u><b>Category Comment:</b></u> No revisions to this section or requirement.		
[192.605(b)][192.713(a)(1)]	Does the operator's procedure require that each imperfection or damage that impairs the serviceability of pipe in a steel transmission line operating at or above 40 percent of SMYS must be removed by cutting out and replacing a cylindrical piece of pipe; OR must be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	<b>Not Checked</b>

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[192.605(b)][192.713(b)]	Does the operator's procedure require that the operating pressure must be at a safe level during repair operations?	<b>Not Checked</b>
[192.605(b)][192.715(a)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 if the segment of transmission line is taken out of service?	<b>Not Checked</b>
[192.605(b)][192.715(b)(1)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the weld is not leaking?	<b>Not Checked</b>
[192.605(b)][192.715(b)(2)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the pressure is reduced to produce a stress that is 20% of SMYS?	<b>Not Checked</b>
[192.605(b)][192.715(b)(3)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the grinding is limited so that 1/8 inch thickness of pipe weld remains?	<b>Not Checked</b>
[192.605(b)][192.715(c)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) and cannot be repaired in accordance with .715(a) or .715(b) then a full encirclement welded split sleeve of appropriate design must be installed?	<b>Not Checked</b>
[192.605(b)][192.717(a)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by removing the leak by cutting out and replacing a cylindrical piece of pipe? OR	<b>Not Checked</b>
[192.605(b)][192.717(b)(1)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a full encirclement welded split sleeve of appropriate design, unless the transmission line is joined by mechanical couplings and operates at less than 40 percent of SMYS? OR	<b>Not Checked</b>

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[192.605(b)][192.717(b)(2)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a properly designed bolt-on-leak clamp if the leak is due to a corrosion pit? OR	Not Checked
[192.605(b)][192.717(b)(3)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi (267 Mpa) SMYS, fillet weld over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size? OR	Not Checked
[192.605(b)][192.717(b)(4)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is on a submerged pipeline in inland navigable waters, mechanically apply a full encirclement split sleeve of appropriate design? OR	Not Checked
[192.605(b)][192.717(b)(5)]	Does the operator's procedure require that each permanent field repair of a leak on a transmission line must be made by applying a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Not Checked
[192.605(b)][192.719(a)]	Does the operator's procedure require that replacement pipe must be pressure tested to meet the requirements of a new pipeline?	Not Checked
[192.605(b)][192.719(b)]	Does the operator's procedure require that for lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241(c)?	Not Checked
<b>TEST REQUIREMENTS FOR REINSTATING SERVICE LINES</b>		<b>Status</b>
[192.605(b)][192.725(a)]	Does the operator's procedure require that disconnected service lines must be tested the same as a new service line?	Satisfactory
<b><u>General Comment:</u></b> <i>This is defined in 2. C. (3) of LEAK 2.05. This states if service line piping has been disconnected from its source of supply a pressure test is required to be performed prior to restoring gas pressure to the isolated segment of pipe.</i>		
[192.605(b)][192.725(b)]	Does the operator's procedure require that service lines that are temporarily disconnected must be	Unsatisfactory

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	tested from the point of disconnection, the same as a new service line, before reconnect?	
<p><b><u>NOA Comment:</u></b></p> <p>Review of revisions made to 2. C. (3) (d) in LEAK 2.05 indicate a pressure test is required on a segment of piping being reinstated or replaced. This section further indicates a test is not required on a segment of main or service piping that is being abandoned. Staff has no issue with the abandoned section but does want to know where the soap test of the cap, plug or fitting used to isolate the live facility is leak tested using leak detection solution. This section does not include the documentation of this test or indicate how or where it will be documented. Staff determined the records are required to be documented in 5 of the abandonment section of ABND 2.01. Staff requests that Ameren reference or define where and how this leak test shall be recorded and retained.</p>		
<b>ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES</b>		<b>Status</b>
[192.605(b)][192.727(b)]	Does the operator's procedure require disconnecting both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained?	<b>Satisfactory</b>
<p><b><u>NOA Comment:</u></b></p> <p>Review of LEAK 2.05 dealing with abandonment of facilities states no pressure test is required if piping is being permanently disconnected. If a service or main is abandoned, the cap or isolation point on the live facility shall be tested to ensure no leakage is present. How / where will the leak test be recorded if not recorded here to document the leak test on the cap, plug or isolation point for the abandonment? Staff requests either a reference be added here or indicate where the leak test is to be documented.</p>		
[192.605(b)][192.727(c)]	Does the operator's procedure require that, except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end?	<b>Satisfactory</b>
[192.605(b)][192.727(d)(1)]	Does the operator's procedure require that whenever service to a customer is discontinued the valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator? OR	<b>Not Applicable</b>
<p><b><u>General Comment:</u></b></p> <p>This requirement was not included in the revisions submitted by the company.</p>		
[192.605(b)][192.727(d)(2)]	Does the operator's procedure require that whenever service to a customer is discontinued a mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly? OR	<b>Not Applicable</b>
<p><b><u>General Comment:</u></b></p> <p>This requirement was not included in the revisions submitted by the company.</p>		
[192.605(b)][192.727(d)(3)]	Does the operator's procedure require that whenever service to a customer is discontinued the customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed?	<b>Not Applicable</b>
<p><b><u>General Comment:</u></b></p>		

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<i>This requirement was not included in the revisions submitted by the company.</i>		
[192.605(b)][192.727(e)]	Does the operator's procedure require that if air is used for purging, the operator shall ensure that a combustible mixture is not present after purging?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>This requirement was not included in the revisions submitted by the company.</i>		
[192.605(b)][192.727(g)]	Does the operator's procedure require that the operator must file reports upon abandoning underwater facilities crossing commercially navigable waterways, including offshore facilities?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>This requirement was not included in the revisions submitted by the company.</i>		
COMPRESSOR STATION PROCEDURES		Status
<b><u>Category Comment:</u></b> <i>No revisions to this section or requirement.</i>		
[192.605(b)(7)][192.605(b)(6)]	Does the operator's procedure include provisions for isolating units or sections of pipe and for purging before returning to service?	<b>Not Checked</b>
[192.605(b)(7)][192.605(b)(7)]	Does the operator's procedure require starting, operating, and shutdown procedures for gas compressor units?	<b>Not Checked</b>
[192.605(b)(7)][192.731]	Does the operator's procedure require inspection and testing for remote control shutdowns and pressure relieving devices at a minimum of 1 per yr/15 months), prompt repair or replacement?	<b>Not Checked</b>
[192.605(b)(7)][192.735(a)]	Does the operator's procedure require storage of excess flammable or combustible materials at a safe distance from the compressor buildings?	<b>Not Checked</b>
[192.605(b)(7)][192.735(b)]	Does the operator's procedure require above ground storage tanks to be protected according to NFPA #30; Amdt 192-103 pub. 06/09/06 eff. 07/10/06?	<b>Not Checked</b>
[192.605(b)(7)][192.736(a)(1)]	Does the operator's procedure require that compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: 50% of the upright side areas are permanently open? OR	<b>Not Checked</b>
[192.605(b)(7)][192.736(a)(2)]	Does the operator's procedure require compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: It is an unattended field compressor station of 1000 hp or less?	<b>Not Checked</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

Unless otherwise noted, all code references are to 49CFR Part 192.  
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

PRESSURE LIMITING and REGULATING STATION PROCEDURES		Status
[192.605(b)][192.739(a)(1)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is in good mechanical condition?	Not Checked
<b>General Comment:</b> This was not included in the revisions submitted for review.		
[192.605(b)][192.739(a)(2)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	Not Checked
<b>General Comment:</b> This was not included in the revisions submitted for review.		
[192.605(b)][192.739(a)(3)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	Not Checked
<b>General Comment:</b> This was not included in the revisions submitted for review.		
[192.605(b)][192.739(a)(4)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is properly installed and protected from dirt, liquids, and other conditions that may prevent proper operation.	Not Checked
<b>General Comment:</b> This was not included in the revisions submitted for review.		
[192.605(b)][192.739(b)]	Does the operator's procedure require steel pipelines whose MAOP is determined under §192.619(c), if the MAOP is 60 psi (414 kPa) gauge or more, the control or relief pressure limit is as required by .739 (b).	Not Checked
<b>General Comment:</b> This was not included in the revisions submitted for review.		
[192.605(b)][192.741(a)]	Does the operator's procedure require telemetering or recording pressure gauges to be in place to	Not Checked



# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	indicate gas pressure in the district that is supplied by more than one regulating station?	
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
[192.605(b)][192.741(b)]	Does the operator's procedure require the operator to determine the need in a distribution system supplied by only one district station?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
[192.605(b)][192.741(c)]	Does the operator's procedure require the operator to inspect equipment and take corrective measures when there are indications of abnormally high or low pressure?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Review of EMER 2.04 Gas Field Personnel indicates the revisions completed were positive revisions and did not lessen the requirements. The actions defined for indications of high or low pressure appear to be adequate.</i>		
[192.605(b)][192.743(a)]	Does the operator's procedure require that capacity must be consistent with .201(a) except for .739(b), and be determined at a minimum of 1 per yr/15 months?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
[192.605(b)][192.743(b)]	If the capacities are calculated, Does the operator's procedure require them to be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
[192.605(b)][192.743(c)]	Does the operator's procedure require new or additional devices be installed to provide required capacity if insufficient capacity exists?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
<b>VALVE AND VAULT MAINTENANCE PROCEDURES</b>		<b>Status</b>
<b><u>Category Comment:</u></b> <i>No revisions to this section or requirement.</i>		
[192.605(b)][192.745(a)]	Does the operator's procedure require that each transmission valve that might be required during an	<b>Not Checked</b>

## OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

Unless otherwise noted, all code references are to 49CFR Part 192.

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	emergency is inspected and partially operated at a minimum of 1 per year/15 months?	
[192.605(b)][192.745(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any transmission valve found inoperable, unless the operator designates an alternative valve?	Not Checked
[192.605(b)][192.747(a)]	Does the operator's procedure require that each distribution valve that might be required during an emergency is checked and serviced at a minimum of 1 per year/15 months?	Not Checked
[192.605(b)][192.747(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any valve found inoperable, unless the operator designates an alternative valve?	Not Checked
[192.605(b)][192.749]	Does the operator's procedure require that vaults greater than 200 cubic feet must be inspected at a minimum of 1 per year/15 months?	Not Checked
<b>PREVENTION of ACCIDENTAL IGNITION PROCEDURES</b>		<b>Status</b>
[192.605(b)][192.751(a)]	Does the operator's procedure require that when a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided?	Not Checked
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
[192.605(b)][192.751(b)]	Does the operator's procedure prohibit gas or electric welding or cutting on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work?	Not Checked
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
[192.605(b)][192.751(c)]	Does the operator's procedure require that warning signs will be posted, where appropriate?	Not Checked
<b><u>General Comment:</u></b> <i>This was not included in the revisions submitted for review.</i>		
<b>CAULKED BELL AND SPIGOT JOINTS PROCEDURES</b>		<b>Status</b>
<b><u>Category Comment:</u></b> <i>The operator has no cast iron or ductile iron piping remaining in their service areas in Illinois.</i>		
[192.605(b)][192.753(a)]	Does the operator's procedure require that each cast iron caulked bell and spigot joint that is subject to	Not Applicable

## OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	pressures of more than 25 psi gage must be sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)?	
[192.605(b)][192.753(b)]	Does the operator's procedure require that when cast iron bell and spigot subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking?	<b>Not Applicable</b>
<b>PROTECTING CAST-IRON PIPELINE PROCEDURES</b>		<b>Status</b>
<b><u>Category Comment:</u></b> <i>The operator has no cast iron or ductile iron piping remaining in their service areas in Illinois.</i>		
[192.605(b)][192.755(a)(1)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from vibrations from heavy construction equipment, trains, trucks, buses or blasting?	<b>Not Applicable</b>
[192.605(b)][192.755(a)(2)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from impact forces by vehicles?	<b>Not Applicable</b>
[192.605(b)][192.755(a)(3)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from earth movement?	<b>Not Applicable</b>
[192.605(b)][192.755(a)(4)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from apparent future excavations near the pipeline?	<b>Not Applicable</b>
[192.605(b)][192.755(a)(5)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to a bending stress?	<b>Not Applicable</b>
[192.605(b)][192.755(b)]	Does the operator's procedure require the operator to as soon as feasible; provide permanent protection for the disturbed segment from external loads?	<b>Not Applicable</b>
<b>WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES</b>		<b>Status</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

<b><u>Category Comment:</u></b>		
<i>No revisions to this section or requirement.</i>		
[192.13(c)][192.225(a)]	Does the operator's procedure require their welding procedures to be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test?	<b>Not Checked</b>
[192.13(c)][192.225(b)]	Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests?	<b>Not Checked</b>
[192.13(c)][192.227(a)]	Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code?	<b>Not Checked</b>
[192.13(c)][192.227(b)]	Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS?	<b>Not Checked</b>
[192.13(c)][192.229(a)]	Does the operator's procedure require a welder to successfully complete a destructive test to weld on compressor station piping and components?	<b>Not Checked</b>
[192.13(c)][192.229(b)]	Does the operator's procedure require no welder may weld with a particular welding process unless, within the preceding 6 months, he has engaged in welding with that process?	<b>Not Checked</b>
[192.13(c)][192.229(c)(1)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at > 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the sections 6 or 9 of API Standard 1104?	<b>Not Checked</b>
[192.13(c)][192.229(c)(2)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at < 20% SMYS unless the welder is tested in accordance with .229(c) (1) or requalifies under .229(d) (1) or (d) (2)?	<b>Not Checked</b>
[192.13(c)][192.229(d)(1)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 1 year/15 months? OR	<b>Not Checked</b>
[192.13(c)][192.229(d)(2)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 7 1/2 months but at least twice per calendar year and has met the requirements of .229(d)(i)(ii)?	<b>Not Checked</b>
[192.13(c)][192.231]	Does the operator's procedure require that welding operations must be protected from weather conditions that would impair the quality of the completed weld?	<b>Not Checked</b>

## OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

[192.13(c)][192.233]	Does the operator's procedure require that miter joints be made in accordance with this section?	Not Checked
[192.13(c)][192.235]	Does the operator's procedure require proper welding surface preparation and joint alignment?	Not Checked
[192.13(c)][192.241(a)(1)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure compliance with the welding procedure?	Not Checked
[192.13(c)][192.241(a)(2)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure that the weld is acceptable in accordance with Section 9 of API 1104?	Not Checked
[192.13(c)][192.241(b)(1)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except welds that are visually inspected and approved by a qualified welding inspector if the nominal pipe diameter is less than 6 inches? OR	Not Checked
[192.13(c)][192.241(b)(2)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except a pipeline that is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that nondestructive testing is impractical?	Not Checked
[192.13(c)][192.241(c)]	Does the operator's procedure require that the acceptability of a weld, which is based on nondestructively tested or visually inspected, is determined according to the standards in Section 9 of API Standard 1104?	Not Checked
[192.13(c)][192.245(a)]	Does the operator's procedure require that each weld that is unacceptable must be removed or repaired?	Not Checked
[192.13(c)][192.245(b)]	Does the operator's procedure require that each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair?	Not Checked
[192.13(c)][192.245(c)]	Does the operator's procedure require that repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure qualified under §192.225?	Not Checked
Discuss with the operator regarding the use of a low hydrogen process when welding a sleeve for repair.		Not Checked
<b>TRANSMISSION NONDESTRUCTIVE TESTING PROCEDURES</b>		<b>Status</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

<b>Category Comment:</b>		
<i>No revisions to this section or requirement.</i>		
[192.13(c)][192.243(a)]	Does the operator's procedure require that nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld?	<b>Not Checked</b>
[192.13(c)][192.243(b)(1)]	Does the operator's procedure require that nondestructive testing of welds must be performed in accordance with written procedures?	<b>Not Checked</b>
[192.13(c)][192.243(b)(2)]	Does the operator's procedure require that nondestructive testing of welds must be performed by persons who have been trained and qualified in the established procedures and with the equipment employed in testing?	<b>Not Checked</b>
[192.13(c)][192.243(c)]	Does the operator's procedure require that procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under §192.241(c)?	<b>Not Checked</b>
[192.13(c)][192.243(d)(1)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference In Class 1 locations at least 10 percent?	<b>Not Checked</b>
[192.13(c)][192.243(d)(2)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 2 locations at least 15 percent?	<b>Not Checked</b>
[192.13(c)][192.243(d)(3)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100% unless impracticable, then 90%?	<b>Not Checked</b>
[192.13(c)][192.243(d)(4)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require	<b>Not Checked</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference at pipeline tie-ins, 100 %?	
[192.13(c)][192.243(e)]	Does the operator's procedure require that a sample of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b), except for a welder whose work is isolated from the principal welding activity?	Not Checked
[192.13(c)][192.243(f)]	Does the operator's procedure require that the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds?	Not Checked
<b>JOINING of PIPELINE MATERIALS OTHER THAN BY WELDING PROCEDURES</b>		<b>Status</b>
<b><u>Category Comment:</u></b>		
There were no revisions to this section of the O&M so the requirement was marked as not checked.		
[192.273(b)][192.283(b)]	Does the operator have qualified joining procedures for mechanical joints?	Not Checked
[192.281(a)][192.281(a)]	Does the operator's procedure prohibit joining plastic pipe by threaded or miter joint?	Not Checked
[192.273(b)][192.283(a)]	Does the operator have qualified joining procedures for heat fusion, solvent cement, and adhesive joints?	Satisfactory
<b><u>General Comment:</u></b>		
The revised procedures for acceptable fittings to be utilized when installing pe piping included the deletion of several fittings and the addition of the new fittings that have been authorized to be utilized when installing pe piping. The fitting revisions were for tees, couplings and end caps going from Innogaz and Friatec to Central Plastics and are included in POLY 2.05 and 3.02.		
[192.273(b)][192.283(c)]	Does the operator's procedure require that persons making and inspecting joints must have available a copy of the qualified joining procedure?	Not Checked
[192.273(b)][192.285(a)]	Does the operator's procedure require that person making joints with plastic pipe must be qualified?	Not Checked
[192.273(b)][192.285(b)(1)]	Does the operator's procedure require the specimen joint to be visually examined during and after assembly or joining?	Not Checked
[192.273(b)][192.285(b)(2)]	Does the operator have procedures requiring when a specimen joint used for personnel qualification in the case of a heat fusion, solvent cement, or adhesive joint be tested under any one of the qualified test methods?	Not Checked
[192.273(b)][192.285(c)]	Does the operator have procedures that require a person to be requalified if during any 12 month period	Not Checked

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	that person does not make any joints or has 3 joints or 3% of joints, whichever is greater, found to be unacceptable?	
[192.273(b)][192.285(d)]	Does the operator have a method to determine that each person making joints on plastic pipelines is qualified?	Not Checked
[192.273(b)][192.287]	Does the operator's procedure require that person inspecting plastic pipe joints must be qualified by appropriate training or experience to evaluate plastic pipe joints?	Not Checked
<b>CORROSION CONTROL PROCEDURES</b>		<b>Status</b>
[192.605(b)][192.453]	Does the operator's procedure require that corrosion control procedures required by .605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?	Satisfactory
<b><u>General Comment:</u></b> Staff reviewed the revisions to CORR 2.31 Corrosion and Steel Damage Evaluation. The revisions to 2.31 identify what records are to be completed and where the records completed under this section are to be maintained. Staff had no issues with the revisions for this section.  CORR 3.15 for Rectifier Installations and observed no issues with the revisions to the suggested wire connector protectors to be used on ground bed cables.		
[192.605(b)][192.455(a)]	Does the operator's procedure require that pipelines installed after July 31, 1971, buried segments must be externally coated and cathodically protected within one year after completion of construction? (see exceptions in code)	Not Checked
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.455(e)]	Does the operator's procedure require that aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved?	Not Checked
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.457(a)]	Does the operator's procedure require that all effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically protected?	Not Checked
<b><u>General Comment:</u></b>		



# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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Not reviewed as it was not part of the revisions submitted in version 5.1.

[192.605(b)][192.457(b)]	Does the operator's procedure require that cathodic protection must be provided in areas of active corrosion for bare or ineffectively coated transmission lines, and bare or coated compressor station piping, regulator station, meter station piping, and (except for cast iron or ductile iron) bare or coated distribution lines installed before August 1, 1971?	<b>Not Checked</b>
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**General Comment:**

No revisions to this section or requirement.

[192.605(b)][192.479(b)]	Does the operator's procedure require coating material to be suitable for the prevention of atmospheric corrosion?	<b>Satisfactory</b>
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**General Comment:**

The operator added procedures for cold applied wax wraps and removed Tapecoat Rugged Wrap. There are also revised requirements for painting meter sets after completing work where the paint has been damaged during work to prevent the possibility of atmospheric corrosion. No issues identified.

[192.605(b)][192.459]	Does the operator's procedure require that whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated and remedial actions taken when required?	<b>Unsatisfactory</b>
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**NOA Comment:**

Staff has concerns with the revision to 2.30 which does not require completion of a pipe inspection form on piping that is being abandoned. The information gathered may give the operator pertinent information on connected piping that is not being abandoned or is of the same vintage and coating type that is located in other parts of their system. Staff requests that this information should be retained when piping is exposed during the abandonment to aid in detecting issues with similar piping, materials or coatings.

[192.605(b)][192.461(a),192.461(b)]	Does the operator's procedure address the external protective coating requirements of the regulations?	<b>Not Checked</b>
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**General Comment:**

No revisions to this section or requirement.

[192.605(b)][192.463]	Does the operator's procedure require cathodic protection levels that comply with one or more applicable criteria contained in Appendix D?	<b>Not Checked</b>
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**General Comment:**

No revisions to this section or requirement.

[192.605(b)][192.465(a)]	Does the operator's procedure require pipe-to-soil monitoring at a minimum of 1 per year/15 months and for separately protected short sections of main and transmission main or separately protected service lines require monitoring of 10% of the system to be surveyed annually?	<b>Not Checked</b>
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<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.465(b)]	Does the operator's procedure require rectifier monitoring be conducted at a minimum of 6 per year/2 1/2 months?	<b>Not Checked</b>
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.465(c)]	Does the operator's procedure require critical interference bond monitoring be conducted at a minimum of 6 per year/2 1/2 months and non-critical bond monitoring be conducted at a minimum of 1 per year/15 months?	<b>Not Checked</b>
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.465(d)]	Does the operator's procedure require that prompt remedial action to correct any deficiencies indicated by the monitoring?	<b>Not Checked</b>
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.465(e)]	Does the operator's procedure require electrical surveys on bare and unprotected lines at a minimum of once per 3 years/39 months and must cathodically protect active corrosion areas, if found?	<b>Not Checked</b>
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.467(a)]	Does the operator's procedure require that each buried or submerged pipeline be electrically isolated from other underground metallic structures, unless interconnected?	<b>Not Checked</b>
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.467(b)]	Does the operator's procedure require that one or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control?	<b>Not Checked</b>
<b><u>General Comment:</u></b> No revisions to this section or requirement.		

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[192.605(b)][192.467(c)]	Does the operator's procedure require that each pipeline must be electrically isolated from metallic casings that are a part of the underground system?	<b>Unsatisfactory</b>
<p><b><u>General Comment:</u></b></p> <p>Review of CORR 3.17 Cased Crossing monitoring identified no issues with this addition.</p>		
<p><b><u>NOA Comment:</u></b></p> <p>Review of the casing inspection procedures defined in CORR 2.19 established the requirement for the type of further testing is not defined in the "Note" section. (3) Casings with less than 25 mV difference between the pipe-to-soil readings shall have an additional test for isolation performed and be reported to the Gas Supervisor for further analysis, unless the casing is filled.</p> <p>Note: If the half cell has to be moved to perform both potential tests, casings with less than 200 mV difference between the pipe-to-soil and casing-to-soil readings shall have at least one additional test performed and be reported to the Corrosion Supervisor for additional analysis.</p> <p>Staff requests the operator to include "test for isolation" in the notes section as it is defined in number 3 of this section.</p>		
[192.605(b)][192.467(d)]	Does the operator's procedure require that inspection and electrical tests must be made to assure that electrical isolation is adequate?	<b>Satisfactory</b>
<p><b><u>General Comment:</u></b></p> <p>Revisions to Section 3.17 identify the testing requirements for electrical isolation at a casing.</p>		
[192.605(b)][192.469]	Does the operator's procedure define how a sufficient number of test stations or contact points for electrical measurement are established to determine the adequacy of cathodic protection?	<b>Not Checked</b>
<p><b><u>General Comment:</u></b></p> <p>No revisions to this section or requirement.</p>		
[192.605(b)][192.471]	Does the operator's procedure define how test leads will be installed and maintained?	<b>Not Checked</b>
<p><b><u>General Comment:</u></b></p> <p>No revisions to this section or requirement.</p>		
[192.605(b)][192.473(a)]	Does the operator's procedure require the determination of how interference currents are affecting the cathodic protection system?	<b>Not Checked</b>
<p><b><u>General Comment:</u></b></p> <p>No revisions to this section or requirement.</p>		
[192.605(b)][192.473(b)]	Does the operator's procedure require the determination that impressed current type cathodic protection system or galvanic anode system are designed and installed to minimize any adverse effects on existing adjacent underground metallic structures?	<b>Satisfactory</b>
<p><b><u>General Comment:</u></b></p> <p>This is defined in section CORR 2.24 Corrosion Control Stray Current and requires the testing of neighboring facilities if a rectifier is to be installed, isolated or</p>		

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removed to ensure it will not affect the neighboring facility.		
[192.605(b)][192.475(a)]	Does the operator's procedure require that if corrosive gas is transported by pipeline, the corrosive effect of the gas on the pipeline must be investigated and steps taken to minimize internal corrosion?	<b>Not Checked</b>
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.475(b)]	Does the operator's procedure require that whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> This is defined in 24-27 of CORR 2.30.		
[192.605(b)][192.475(b)(1)]	Does the operator's procedure require that when internal corrosion is observed that the adjacent pipe will be inspected for internal corrosion?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> In the revisions made to the abandonment sections the requirement for inspection for internal corrosion is required to be performed when ever piping is accessed to allow for internal inspections.		
[192.605(b)][192.475(b)(2)]	Does the operator's procedure require replacement of pipe when internal corrosion is observed to the extent required by the applicable paragraphs of §§192.485, 192.487, or 192.489?	<b>Not Checked</b>
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.475(b)(3)]	Does the operator's procedure require the steps that must be taken when internal corrosion is discovered?	<b>Not Checked</b>
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.476(a)]	Does the operator's procedure require features incorporated into its design and construction of transmission lines installed after May 23, 2007, to reduce internal corrosion?	<b>Not Checked</b>
<b><u>General Comment:</u></b> No revisions to this section or requirement.		
[192.605(b)][192.477]	Does the operator's procedure require, if corrosive gas is being transported, the use of internal corrosion control coupons, or other suitable means of	<b>Satisfactory</b>

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	monitoring at a minimum of 2 per year/7 1/2 months?	
[192.605(b)][192.479(a)]	Does the operator's procedure require each exposed pipe, including soil-to-air interface, to be cleaned and coated?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>No revisions to this section or requirement.</i>		
[192.605(b)][192.481(a)]	Does the operator's procedure require atmospheric corrosion control monitoring at a minimum of 1 per 3 years/39 months?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>No revisions to this section or requirement.</i>		
[192.605(b)][192.481(b)]	Does the operator's procedure require particular attention to atmospheric corrosion on exposed pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>No revisions to this section or requirement.</i>		
[192.605(b)][192.481(c)]	Does the operator's procedure require protection be provided if atmospheric corrosion is discovered?	<b>Satisfactory</b>
[192.605(b)][192.483]	Does the operator's procedure require that replacement pipe be coated and cathodically protected?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>No revisions to this section or requirement.</i>		
[192.605(b)][192.485(a)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if general corrosion has reduced the wall thickness?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>No revisions to this section or requirement.</i>		
[192.605(b)][192.485(b)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if localized corrosion has reduced the wall thickness?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff's review of the revisions to #5 of Section 2.28 indicates the wording added is correct in stating "The tables below are not valid for steel pipe with yield strength specifications less than 35,000 psig. Contact Corrosion Control personnel for allowable pit lengths if pipe is less than 35,000 psig. If the yield strength of the pipe is not known, allowable pit lengths should be based on a pipe with yield strength of 24,000 psig."</i>		

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[192.605(b)][192.485(c)]	Does the operator's procedure require the use of Rstreng or B-31G to determine the remaining wall strength?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>The pitting charts in CORR 2.28 Evaluation of Corrosion is indicating calculations taken from B31G.</i>		
[192.605(b)][192.487(a)]	Does the operator have procedures to replace or repair distribution pipe if general corrosion has reduced the wall thickness?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>Replacement of corroded piping is defined in CORR 2.28 Evaluation of Corrosion.</i>		
[192.605(b)][192.487(b)]	Does the operator have procedures to replace or repair distribution pipe if localized corrosion has reduced the wall thickness?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff's review of the revisions to #5 of Section 2.28 indicates the wording added is correct in stating "The tables below are not valid for steel pipe with yield strength specifications less than 35,000 psig. Contact Corrosion Control personnel for allowable pit lengths if pipe is less than 35,000 psig. If the yield strength of the pipe is not known, allowable pit lengths should be based on a pipe with yield strength of 24,000 psig.</i>		
[192.605(b)][192.489(a)]	Does the operator have procedures to replace pipe if general graphitization is discovered on cast or ductile iron pipe?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There is no known cast or ductile iron remaining in the Ameren Systems located in Illinois.</i>		
[192.605(b)][192.489(b)]	Does the operator have procedures to repair or replace pipe or seal by internal sealing methods when localized graphitization is discovered on cast or ductile iron pipe?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>There is no known cast or ductile iron piping remaining in the Ameren Illinois System.</i>		
[192.605(b)][192.491(a)]	Does the operator have procedures requiring the retention of records and maps to show the location of cathodically protected pipe, facilities, anodes, and bonded structures?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>No revisions to this section or requirement.</i>		
[192.605(b)][192.491(b)]	Does the operator have procedures requiring the retention of records under .491(a) for the life of the pipeline?	<b>Not Checked</b>
<b><u>General Comment:</u></b> <i>No revisions to this section or requirement.</i>		
[192.605(b)][192.491(c)]	Does the operator have procedures that require the	<b>Not Checked</b>

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	retention of testing, surveys, or inspections records which detail the adequacy of the corrosion control measures for a minimum of 5 years?	
<b>General Comment:</b> No revisions to this section or requirement.		
<b>UPRATING PROCEDURES</b>		<b>Status</b>
<b>Category Comment:</b> No revisions to this section or requirement.		
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include pressure raised in increments?	<b>Not Checked</b>
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include section checked before further pressure increase?	<b>Not Checked</b>
[192.13(c)][192.553(a)(2)]	Does the operator's procedure include uprating requirements which meet Subpart K and include hazardous leaks repaired between increments?	<b>Not Checked</b>
[192.13(c)][192.553(b)]	Does the operator's procedure include uprating requirements which meet Subpart K and include records kept for life of system?	<b>Not Checked</b>
<b>TRAINING</b>		<b>Status</b>
<b>Category Comment:</b> No revisions to this section or requirement.		
[520.10(a)(1)]	Does the operator's procedure contain adequate descriptions of types of training each job classification requires, including those of field foreman, field crew leaders, leak inspectors, new construction inspectors, servicemen and corrosion technicians and/or equivalent classifications?	<b>Not Checked</b>
[520.10(a)(2)]	Does the operator's procedure include scheduling of verbal instruction and/or on-the-job training for each job classification?	<b>Not Checked</b>
[520.10(a)(3)]	Does the operator's procedure include provisions for evaluating the performance of personnel to assure their competency in performing the work assigned to them?	<b>Not Checked</b>
[520.10(a)(4)]	Does the operator's procedure include subject matter relating to recognition of potential hazards, and actions to be taken toward prevention of accidents?	<b>Not Checked</b>
[520.10(a)(5)]	Are the operator's procedures periodically updated to include new materials, new methods of operation and	<b>Not Checked</b>

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	installation, and changes in general procedures?	
[520.10(a)(6)]	Are the operator's procedures made a part of the gas system's operation, inspection and maintenance plan, and filed with the Commission?	<b>Not Checked</b>
[520.10(b)]	Does the operator's procedure require that the operator/personnel (municipal/master meter) attend regularly scheduled instructional courses held by utility companies or participate in courses such as the IGT Gas Distribution Home Study Course, or programs developed and presented by community colleges, vocational schools, universities, consultants or other recognized gas distribution oriented agencies?	<b>Not Checked</b>
[520.10(a)]	Does the operator's procedure specify methods to be used for training, including frequency and subject matter of training?	<b>Not Checked</b>



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